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May 30, 2002

Ms. Marlene H. Dortch
Commission Secretary
Federal Communications Commission.
445 12th Street, SW
Washington, DC 20554

Subject: Re-designation of Urban Area for Rural Health Care Program in the Pacific Insular Areas (Re: WC Docket No. 02-60)

Dear Commission Secretary:

IT&E Overseas, Inc., ("IT&E"), a telecommunications company authorized under Section §214 of the Telecommunications Act, 47 U.S.C. 214 to provide global facilities-based and resale services from Guam the CNMI, is in full support of the comments from the Governor of Guam regarding the redefinition of Honolulu as the urban center for Guam for the Rural Health Care Program.

As you know, the Telecommunications Act of 1996 established a universal service fund to assist needy schools, libraries, and health care providers to obtain telecommunication services for internet access, distance learning, and telehealth and telemedicine applications. The fund is supported through universal service fees (USF) that are paid by all subscribers. Guam schools have benefited under the Schools & Libraries Program since the qualification for the program is based on the percentage of students that qualify for the School Lunch Program and other income and means tests, of which Guam schools have ranked high based on need. As a result, many public and private schools now have connected to the internet and have implemented distance based learning technologies.

The same cannot be said of Guam's participation in the Rural Health Care Program., because of the designation of Agana as the "urban city" for which the Guam health care system could benefit from the Rural Health Care Program. As an "urban city", Agana not only does not meet the 50,000 population threshold of the definition of an "urban area", nor are there located any major higher education academic institutions or regional health care resource centers that would serve as a significant resource to Guam's own health care system. The

closest would be health and academic institutions in Hawaii. The high cost of providing telecommunication links to other Pacific Basin service areas hinder the delivery of state of the art, high quality, improved health care (diagnosis and delivery) services to Guam and other parts of the Pacific Insular areas. By designating Hawaii as the "urban area" for Guam, true telemedical services could be implemented, which would result in faster turnaround in diagnosis and cost savings in off-island medical transfers. Also, lower cost communications between Guam and Hawaii's Telemedicine Network (STAN) would also provide a unique opportunity to develop distance education programs to train our local healthcare force and improve our capacity to care for our patients locally.

We are in full support for the re-designation of Honolulu as the urban center for Guam. It would open the way to decreasing the costs for health telecommunications by establishing educational links within the Pacific Basin region and with other areas of the world. I believe that in so doing, the purposes for which Congress established the Universal Service Fund will be met, especially as it relates to assisting schools, libraries and health care providers in the delivery of much needed educational and health services out here in the Pacific.

Sincerely,

A handwritten signature in black ink, appearing to read 'John M. Borlas', with a stylized flourish extending to the right.

John M. Borlas, P.E.
President
IT&E Overseas, Inc.
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Tamuning, Guam 96913

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